

FILED
CLERK

September 28, 2023

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
LONG ISLAND OFFICE

MRM:BTK
F. #2018R01102

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

QIN HUI,
also known as "Hui Qin,"
"Hui Quin," "Muk Lam Li"
and "Karl,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL BENNETT, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

On or about December 21, 2020, within the Eastern District of New York and elsewhere, the defendant QIN HUI, also known as "Hui Qin," "Hui Quin," "Muk Lam Li" and "Karl," together with others, did knowingly and intentionally and without lawful authority produce a false identification document, to wit: a false Florida Driver's License, in and in a manner affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 1028(a)(1), 1028(b)(2)(A), 1028(c)(3)(A), and 2)

TO BE FILED UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN ARREST WARRANT

(18 U.S.C. §§ 1028(a)(1), 1028(b)(2)(A),
1028(c)(3)(A) and 2)

Case No.: 2:23-MJ-00865 (JMW)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the FBI and have been involved in numerous investigations involving, among other crimes, wire fraud, money laundering, identification document fraud, visa fraud, espionage and the failure of agents of a foreign power to properly register with the Department of Justice. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. The defendant QIN HUI, also known as "Hui Qin," "Hui Quin," "Muk Lam Li" and "Karl," was citizen of the People's Republic of China ("PRC"). In or about October 2019, the defendant became a United States Lawful Permanent Resident. From 2019 to the present, the defendant resided in Old Westbury, New York and in New York City, New York.

3. On or about and between January 30, 2019 and April 30, 2019, the defendant QIN HUI, also known as "Hui Qin," "Hui Quin," "Muk Lam Li" and "Karl," engaged in voluntary interviews with me and other FBI personnel (the "FBI interviews").² During the FBI interviews, the defendant stated, in substance, that, in or about 2008, he purchased the alias "Muk Lam Li" (the "Li alias") from a PRC government official for sum of currency. On or about June 8, 2018, a border search revealed that the defendant was carrying a Hong Kong

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

² During these interviews, an FBI linguist was present to translate Mandarin to English and English to Mandarin.

identification card bearing the Li alias and his photograph when he returned on a flight from Hong Kong to John F. Kennedy International Airport in Queens, New York. During the FBI interviews, the defendant further stated, in substance, that, in or about and between September 2017 and November 2017, he used the Li alias to wire transfer approximately \$5 million from bank accounts based in Hong Kong to bank accounts based in the United States. Furthermore, the defendant stated, in substance, that these funds were the proceeds of the sale of stock, which he transferred to his then-spouse, whose identity is known to the United States Attorney (“Jane Doe 1”).

4. On or about December 20, 2020, the defendant QIN HUI, also known as “Hui Qin,” “Hui Quin,” “Muk Lam Li” and “Karl,” travelled on an interstate flight from LaGuardia Airport in Queens, New York to Miami, Florida. The purpose of the defendant’s interstate travel to Florida was to obtain a Florida Driver’s License from the Florida Department of Highway Safety and Motor Vehicles (“FLHSMV”).

5. To obtain a Florida Driver’s License, the FLHSMV required applicants to provide proof of Florida residency. As relevant here, such proof included a bank statement or a credit card statement, bearing a Florida address. Further, the FLHSMV required applicants to sign a statement, “under penalty of perjury,” attesting that “the information” that the applicant provided to the FLHSMV in connection with a Driver’s License application was “true and correct” (the “Sworn Statement”).

6. On or about December 21, 2020, after travelling from New York to Florida, the defendant QIN HUI, also known as “Hui Qin,” “Hui Quin,” “Muk Lam Li” and “Karl,” applied to the FLHSMV for a Florida Driver’s License. In his application, the defendant stated that his name was “HUI QIN” and that he resided at an address in Miami, Florida (the

“Miami address”). In connection with the application, the defendant provided the FLHSMV with documents purporting to be statements from Bank of America and Macy’s, Inc. that were issued to “HUI QUIN” at the Miami address (the “defendant’s proffered documents”). In truth and in fact, as the defendant well knew and believed, he never resided at the Miami address and the defendant’s proffered documents were false and were intended to fraudulently induce the FLHSMV to issue the defendant a Florida Driver’s License.

7. After providing the FLHSMV with the defendant’s proffered documents, the defendant QIN HUI, also known as “Hui Qin,” “Hui Quin,” “Muk Lam Li” and “Karl,” signed the Sworn Statement and stated falsely that “the information” that he provided to the FLHSMV in connection with his application for a Florida Driver’s License was “true and correct.” On or about December 21, 2020, the FLHSMV issued a Florida Driver’s License (the “fraudulently-obtained Florida Driver’s License”) to the defendant. Thereafter, the defendant returned to New York from Florida on an interstate flight.

8. In or about and between April 2021 and June 2021, the defendant QIN HUI, also known as “Hui Qin,” “Hui Quin,” “Muk Lam Li” and “Karl,” provided the fraudulently-obtained Florida Driver’s License as identification to JP Morgan Chase Bank (“Chase”) and Cathay Bank (“Cathay”) in connection with accounts that the defendant maintained at Chase (the “defendant’s Chase account”) and at Cathay. In addition, in or about February 2022, the defendant provided the fraudulently-obtained Florida Driver’s License to the Bullen Insurance Company, which is based in New Hyde Park, New York, in connection with the defendant seeking a motor vehicle insurance policy. Thereafter, in or about and between April 2021 and May 2021, the defendant’s Chase account received approximately \$440,000 in

wire transfers from a bank account held in the name of the Li alias, which were accompanied by wire transfer memoranda, including a memorandum that one of the wire transfers was a “Loan to Beneficiary.”

WHEREFORE, your deponent respectfully requests that the defendant QIN HUI, also known as “Hui Qin,” “Muk Lam Li” and “Karl,” be dealt with according to law.



MICHAEL BENNETT
Special Agent, Federal Bureau of Investigation

Sworn to before me this
28th day of September, 2023 @ 3:00PM

/S/



THE HONORABLE JAMES M. WICKS
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

